

Permit Modification Table

Item #	Proposed Modification	Rationale for Proposed Modification	Document Changes	Classification of Modification
Drum Rinsing Station/ Bulking Station				
99-NC-006-07-2a	A modification is proposed to reconfigure the liquid waste delivery equipment ancillary to the tank farm (Unit #19) in Building 695. A new skid-mounted bulking station will be used to deliver liquid wastes from containers. The bulking station will consist of an open pan connected to existing piping in the tank farm system. Containers with liquid wastes will be dumped into the pan using drum dumpers. Liquid wastes would then be pumped from the pan to the tank farm. The bulking station would also be used for drum rinsing and equipment decontamination. This piece of equipment will eliminate the need for a separate drum rinsing station at the DWTF and will be referred to as the Bulking/Drum Rinsing Station.	The intent of this proposed modification is to use the Bulking/Drum Rinsing Station as the primary means of introducing waste to the Tank Farm instead of stinging. The stinging of wastes poses many significant problems to the operator. First, liquid waste drums usually contain some form of solid debris, which can clog transfer lines. Second, the stinging operation can cause contamination issues when transferring the stinger from drum to drum. Third, the stinging of wastes is not the most efficient way to transfer wastes and requires more physical effort compared to the use of the Bulking Station. Attachment 2, Proposed DWTF Bulking/Drum Rinsing Station, Sections A and B provides additional information about the proposed system, including a more thorough justification for this modification.	Document changes associated with this modification are described below in Proposed modification numbers 99-NC-006-7-2b - k.	LLNL requests that this modification be reviewed as a Class 2 based on 22CCR, Chapter 20, Appendix I, Section G.2, Modification of a Tank unit or secondary containment system without increasing the capacity of the unit.

Permit Modification Table

Item #	Proposed Modification	Rationale for Proposed Modification	Document Changes	Classification of Modification
99-NC-006-07-2b	Modify Part B text to reflect that the Drum Rinsing Station is no longer a separate waste management unit and that the function of drum rinsing has been incorporated into the proposed Bulking/Drum Rinsing Station	This modification is in support of the modification described above and is a text change that changes the name of the Drum Rinsing Station to the Bulking/Drum Rinsing Station for purposes of clarification.	Changes to the following documents will be made to incorporate the station's name: The Part B, Master Table of Contents as shown in Attachment 4; Volume 1, Part VI, Section 1.2 page 7 (Attachment 5); Volume 11, Part XIV.4 TOC; Part XIV.4 Sections 3.2.2, 3.3.7.10, Section 7, and Table XIV.4-1, (Attachment 7); and Appendix XIV.4-P (Attachment 10)	LLNL requests that this modification be reviewed as a Class 1 based on 22CCR, Chapter 20, Appendix I, Section A.1, General Permit Provisions, Administrative and Informational Changes.
99-NC-006-7-2c	Emissions from the Bulking/Drum Rinsing station will not go through the Pollution Off-Gas System (POGS). The Bulking/Drum Rinsing Station will be abated through the general building emissions pollution abatement equipment.	Attachment 2, Proposed DWTF Bulking/Drum Rinsing Station, Sections C and D describe justification for abatement of emissions through the general building emissions pollution abatement equipment. Also included in the discussion, is the fact that wastes that require Container Level II Controls under RCRA's CC-rule will not be processed through the Bulking/Drum Rinsing Station.	Text in Volume 11, Part XIV.4, Section 3.3.2, will be changed as shown in Attachment 7.	LLNL requests that this modification be reviewed as a Class 2. This change most closely fits the description of a modification based on 22CCR, Chapter 20, Appendix I, Section G.4, Tanks, Modification of a Tank Management Practice.

Permit Modification Table

Item #	Proposed Modification	Rationale for Proposed Modification	Document Changes	Classification of Modification
99-NC-006-7-2d	Emissions from the Drum Rinsing Station will not be routed through a VOC scrubber.	Attachment 2, Proposed DWTF Bulking/Drum Rinsing Station, Sections C and D describe justification for abatement of emissions from the Bulking/Drum Rinsing Station through the general building emissions pollution abatement equipment. Also included in the discussion, is the fact that wastes that require Container Level II Controls under RCRA's CC-rule will not be processed through the Bulking/Drum Rinsing Station.	The text in Volume 11, Part XIV.4, sections 3.3.2 and 3.3.7.10 will be modified as shown in Attachment 7.	LLNL requests that this modification be reviewed as a Class 2. This change most closely fits the description of a modification based on 22CCR, Chapter 20, Appendix I, Section G.2, Modification of a tank unit or secondary containment system without increasing the capacity of the unit.
99-NC-006-7-2e	The Bulking/ Drum Rinsing Station will be connected directly to the general building ventilation and will not have a mist eliminator associated with it.	Chemical Engineers in the Hazardous Waste Management Group have determined that there will not be any mist associated with the process and therefore a mist eliminator will not be necessary.	Text in Volume 11, Part XIV.4, Sections 3.3.2, and 3.3.7.10 will be changed to incorporate this modification as shown in Attachment 7.	LLNL requests that this modification be reviewed as a Class 2. This change most closely fits the description of a modification based on 22CCR, Chapter 20, Appendix I, Section G.4, Tanks, Modification of a Tank Management Practice.

Permit Modification Table

Item #	Proposed Modification	Rationale for Proposed Modification	Document Changes	Classification of Modification
99-NC-006-07-2f	Modify Volume 11, Part XIV.4 Table XIV.4-2 to change the name of the Drum Rinsing Station to the Bulking/Drum Rinsing Station. Add inorganic liquids, inorganic solids, organic liquids, and organic solids waste forms to the types of waste that can be processed in the unit. Also add a footnote to limit organic wastes that can be processed in that unit to those not subject to Container Level II Controls under RCRA CC-rule.	This modification is in support of 99-NC-006-07-2a. Currently, Table XIV. 4-2 shows that only inorganic solids and organic solids can be processed through the Drum Rinse Station. But since drum rinsing will no longer be a stand alone process and will be incorporated into the Bulking/Drum Rinsing Station, (where waste will enter the Tank Farm) the waste types that can be processed in the Tank Farm also need to be included for the Bulking/Drum Rinsing Station.	Part B, Volume 11, Part XIV.4 Table XIV.4-2 will be modified as shown in Attachment 7.	LLNL requests that this modification be reviewed as a Class 1 based on 22CCR, Chapter 20, Appendix I, Section A.1 General Permit Provisions, Administrative and informational changes.
99-NC-006-07-2g	Modify Volume 11, Part XIV.4, Table XIV.4-6 to add the obstruction/ displacement volume of the Bulking/Drum Rinsing Station (9 gallons) into the Liquid waste Processing Area and Building 695 Airlock secondary containment zones. The Bulking/Drum Rinsing Station is portable and is being proposed for use in either area, depending on day to day needs.	This modification is in support of 99-NC-006-07-2a. The obstruction/ displacement volume of the Bulking/Drum Rinsing Station is 9 gallons. This displacement volume needs to be addressed in secondary containment capacity calculations in the areas where the station will be utilized. These areas are the Liquid waste Processing Area and Building 695 Airlock secondary containment zones.	Part B, Volume 11, Part XIV.4, Table XIV.4-6 will be modified as shown in Attachment 7.	LLNL requests that this modification be reviewed as a Class 1 based on 22CCR, Chapter 20, Appendix I, Section A.1, General Permit Provisions, Administrative and Informational Changes.

Permit Modification Table

Item #	Proposed Modification	Rationale for Proposed Modification	Document Changes	Classification of Modification
99-NC-006-07-2h	Modify the Waste Analysis Plan, Table 3 by adding the following Form Codes: 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 119, 205, 206, 219, 305, 313, 314, 315, 316, 319, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 519, 607, 608, 609.	This modification is in support of 99-NC-006-07-2a and the rationale is the same as the justification described for item number 99-NC-006-7-f above. Since waste will be introduced through the Bulking/Drum Rinsing Station into the Tank Farm, the Form Codes that are allowed for the Tank Farm need to be allowed (in addition to the Form Codes 308 and 406 already allowed for drum rinsing operations) for the Bulking/Drum Rinsing Station. The only Tank Farm Form Codes that have not been added in this proposed modification are those for concentrated solvent wastes (201, 202, 203, 204, 207, 211) that would require Container Level II Controls to meet RCRA CC-Rule requirements.	Part B, Volume 4, Appendix III-A, Waste Analysis Plan, Table 3, as shown in Attachment 6, will be modified to include these Form Codes. Additionally, Table 3 will be modified to show that the Bulking/Drum Rinsing Station will also be used in the Airlock.	LLNL requests that this modification be reviewed as a Class 1 based on 22CCR, Chapter 20, Appendix I, Section A.1, General Permit Provisions, Administrative and Informational Changes.
99-NC-006-07-2i	Modify the Part B, Volume 11, Part XIV.4, Section 6.1.1.1 to include the Bulking/Drum Rinsing Station description as a waste transfer system.	This modification is in support of item # 99-NC-006-7-2a and is necessary to accurately describe the proposed bulking/drum rinsing operation.	Part B, Vol. 11, Part XIV.4, Section 6.1.1.1, (Waste Transfer System) has been modified to include the Bulking/Drum Rinsing Station description as shown in Attachment 7.	LLNL requests that this modification be reviewed as a Class 1 based on 22CCR, Chapter 20, Appendix I, Section A.1, General Permit Provisions, Administrative and Informational Changes.

Permit Modification Table

Item #	Proposed Modification	Rationale for Proposed Modification	Document Changes	Classification of Modification
99-NC-006-07-2j	Modify the Part B, Volume 11, Part XIV.4, Figure XIV.4-2 to include the Bulking/Drum Rinsing Station and the proposed locations where it will be used.	This modification is in support of item # 99-NC-006-7-2a and is necessary to accurately reflect the proposed changes.	Part B, Volume 11, Part XIV.4, Figure XIV.4-2, will be modified as shown in Attachment 7.	LLNL requests that this modification be reviewed as a Class 1 based on 22CCR, Chapter 20, Appendix I, Section A.1, General Permit Provisions, Administrative and Informational Changes.
99-NC-006-07-2k	Modify the Part B, Volume 11, Appendix XIV.4-P to incorporate the Bulking/Drum Rinsing Station process description.	This modification is in support of item # 99-NC-006-7-2a and is necessary to accurately describe the proposed bulking/drum rinsing operation.	Part B, Volume 11, Appendix XIV.4-P text has been modified as shown in Attachment 9. In addition, Figure I of Appendix XIV.4-P has also been changed to incorporate the Bulking/Drum Rinsing Station.	LLNL requests that this modification be reviewed as a Class 1 based on 22CCR, Chapter 20, Appendix I, Section A.1, General Permit Provisions, Administrative and Informational Changes.

Permit Modification Table

Item #	Proposed Modification	Rationale for Proposed Modification	Document Changes	Classification of Modification
Chopper/Shredder Unit Changes				
99-NC-006-7-3a	Modify the Size Reduction Unit (chopper/shredder) by eliminating the local blowers and housekeeping filters from the ventilation system.	In the early design stages of the DWTF, it was thought that the ventilation system for the size reduction unit required that both the chopper and shredder have two HEPA filters (one of which was a housekeeping HEPA filter) and a blower before the exhaust was routed to the building ventilation system. After the building ventilation system was fully designed, it became apparent that the housekeeping HEPA filters, that had the sole purpose of minimizing contamination to a short run of ductwork, provided little significant benefit in comparison to the added risk of filter maintenance. It also became obvious that the need for a blower after the remaining HEPA filter was not warranted due to the large capacity of the building ventilation fans. The fans associated with the building ventilation system provide all necessary static pressure and flow rate to ensure the chopper and shredder ventilation system operates correctly. The final design of the shredder ventilation system did not incorporate the	Volume 11, Part XIV.4, Section 3.3.7.6, page 16 will be modified to eliminate the local housekeeping HEPA filters and more accurately describe the ventilation system. This text modification is shown in Attachment 7. Also, as shown in Attachment 8, the text in Volume 11, Appendix XIV.4-H, Section 1.2, page H-2 will be modified to remove reference to the blower located before the general building ventilation.	LLNL requests that this modification be reviewed as a Class 2. This change most closely fits the description of a modification based on 22CCR, Chapter 20, Appendix I, Section G.2, Modification of a tank unit or secondary containment system without increasing the capacity of the unit.

Permit Modification Table

Item #	Proposed Modification	Rationale for Proposed Modification	Document Changes	Classification of Modification
99-NC-006-7-3a cont.		blower. As such, the system was built without the inclusion of this local filter and blower. Additional justification discussion is provided in Attachment 3, Proposed Chopper/Shredder Ventilation System Modifications.		
99-NC-006-7-3b	Modify Figure XIV.4-3 to show the changes described in item 99-NC-006-7-1a. The chopper and shredder do not have their own blowers as shown in Figure XIV.4-3, the general Building fan is used instead.	This modification supports the changes to the size reduction units described in item 99-NC-006-7-1a.	Volume 11, Figure XIV.4-3 will be modified as shown in Attachment 7.	LLNL requests that this modification be reviewed as a Class 1 based on 22CCR, Chapter 20, Appendix I, Section A.1, General Permit Provisions, Administrative and Informational Changes.